

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(RICHMOND DIVISION)**

PHILIP MORRIS USA INC.,

Plaintiff,

v.

AMERICAN ACCESSORIES
INTERNATIONAL, L.L.C.,

Defendant.

Civil Action No. 3:15-cv-00577-JAG

EXHIBIT LIST OF PLAINTIFF PHILIP MORRIS USA INC.

Plaintiff Philip Morris USA Inc., by counsel, submits the following list of exhibits in accordance with this Court's Initial Pretrial Order:

EXHIBITS

Exhibit Number	Bates Number	Description
1.	5151431399-400	Original Instruction Sheet
2.	N/A	Compilation of Excerpts from AAI's Website
3.	N/A	CPSC Manufacturer's Guide to Developing Consumer Product Instructions (October 2003)
4.	N/A	CPSC Handbook for Manufacturing Safer Consumer Products (July 2006)
5.	N/A	Consumer Product Safety Act, 15 U.S.C. §§ 2051-2089 (2008)
6.	N/A	CPSC Recall Handbook (March 2012)
7.	5018837374-77	May 20, 2013 Email from Rick Clements with Attachment
8.	AAI00001472-73	May 20, 2013 Email from David Zeanah
9.	AAI0001735-1746	May 22, 2013 Email from Serena Wu
10.	AAI00000008-0009	May 22, 2013 Inspiration Images
11.	AAI00001252-1266	May 30, 2013 Email from Kathryn Simers with Attachment
12.	AAI00001268-69	May 30, 2013 Email from David Zeanah
13.	5018837857-72	May 31, 2013 Email from David Zeanah with Attachment
14.	AAI00009469-9499	June 13, 2013 Email from Kathryn Simers

15.	AAI00009542-9546	June 13, 2013 Email from Kathryn Simers with Attachment
16.	5018797811-814	June 25, 2013 Email from David Zeanah
17.	5018837890-7894	June 26, 2013 Email from David Zeanah with Attachment
18.	AAI00000147-148	June 27, 2013 Email from David Zeanah
19.	AAI00000154-159	July 1, 2013 Email from David Zeanah
20.	AAI00010945-948	July 2, 2013 Email from Chee Seng Teo with Attachment
21.	AAI00010927-928	July 2, 2013 Email from David Zeanah
22.	AAI00010858-860	July 4, 2013 Email from Chee Seng Teo
23.	501879770-7701	July 8, 2013 Email from David Zeanah
24.	5151431407	July 10, 2013 AAI Indemnification Letter from Jill Smith
25.	AAI00010018-[native]	July 11, 2013 Email from Jill Smith with Attachment
26.	5018797061-066	July 22, 2013 Email from David Zeanah with Attachment
27.	N/A	August 27, 2013 - Certified Translation of the Patent Application with Certification
28.	AAI00010378	July 22, 2013 Email from Chee Seng Teo
29.	AAI00010264-266	July 23, 2013 Email from Chee Seng Teo
30.	5018837559-560	August 14, 2013 Email from David Zeanah
31.	5018837995-8021	August 27, 2013 Email from Jill Smith with Attachment
32.	AAI00031765-770	September 16, 2013 Email from Athena Chen with Attachment
33.	5018796426-428	September 20, 2013 Email from David Zeanah with Attachment
34.	AAI00000291; 289-90	September 20, 2013 Email from Mary Isemann with Attachment
35.	AAI00025243-261	September 23, 2013 Purchase Order
36.	5018796317-18; 5018786371;5018786376	September 25, 2013 Email from Rick Clements with Attachment
37.	5018837927-929	September 26, 2013 Purchase Order
38.	5018837925-926	September 27, 2013 Email from Cassie McMahan
39.	AAI00030599-600	September 30, 2013 Email from Eric Zeanah
40.	AAI00035685-688	October 17, 2013 Email from Chee Seng Teo
41.	AAI00035327-331	October 18, 2013 Email from J. Smith
42.	5018791182-184	October 18, 2013 SGS Test Report
43.	5018791185-187	October 18, 2013 SGS Test Report
44.	5018791188-189	October 22, 2013 SGS Test Report
45.	5018791190-1191	October 23, 2013 SGS Test Report
46.	5018791192-1193	October 23, 2013 SGS Test Report

47.	5018791194-1195	October 23, 2013 SGS Test Report
48.	AAI00033805-809	October 24, 2013 Email from Mary Isemann
49.	5018791196-1197	October 29, 2013 SGS Test Report
50.	5018791198-1199	October 29, 2013 SGS Test Report
51.	5018791200-201	October 29, 2013 SGS Test Report
52.	5018791202-204	October 30, 2013 SGS Test Report
53.	5018791205-207	October 30, 2013 SGS Test Report
54.	5018791211-1213	October 30, 2013 SGS Test Report
55.	5018791214-1216	October 30, 2013 SGS Test Report
56.	5018791177-1181	October 31, 2013 Summary Test Report
57.	5018814418-421	November 1, 2013 Purchase Order
58.	5018791217-1219	November 1, 2013 SGS Test Report
59.	5018791223-1225	November 2, 2013 SGS Test Report
60.	5018791226-1231	November 2, 2013 SGS Test Report
61.	AAI0000321-323	November 6, 2013 Email from Mary Isemann
62.	5018790953-0966	November 7, 2013 Email from Jill Smith with Attachment
63.	AAI00000346-355	November 7, 2013 Inline/Final Inspection Summary
64.	5018791208-1210	November 8, 2013 SGS Test Report
65.	5018791171-1176	November 11, 2013 SGS Commission Test Report
66.	5018791220-1222	November 13, 2013 SGS Test Report
67.	5018840436-454	November 18, 2013 Pre-Shipment Inspection Report
68.	5018840455-470	November 22, 2013 Pre-Shipment Inspection Report
69.	5018800305-09	November 26, 2013 Purchase Order
70.	5018837990	November 27, 2013 Email from Jill Smith
71.	5018840471-491	November 29, 2013 Pre-Shipment Inspection Report
72.	5018840395-412	December 6, 2013 Pre-Shipment Inspection Report
73.	5018840327-344	December 12, 2013 Pre-Shipment Inspection Report
74.	5018840345-372	December 19, 2013 Pre-Shipment Inspection Report
75.	5018840373-394	December 27, 2013 Pre-Shipment Inspection Report
76.	5019121592-94	January 15, 2014 Purchase Order
77.	5018840413-435	January 6, 2014 Pre-Shipment Inspection Report
78.	9527526525	March 4, 2014 Email from David Anderson
79.	AAI00000638-640	March 5, 2014 Email from Eric Zeanah
80.	5018815035-39	March 5, 2014 Email from Rick Clements with

		Attachments
81.	5018841832-834	March 7, 2014 Email from Eric Zeanah
82.	AAI00045934;[native]; AAI00047146-41151	March 7, 2014 Email from Molly Arwood with Attachment
83.	5018837737-740	March 9, 2014 Email from Eric Zeanah
84.	AAI00020300-304	March 10, 2014 Email from Chee Seng Teo
85.	5018839883-885	March 11, 2014 UL Test Report
86.	5018837726-27	March 17, 2014 Letter from Eric Zeanah to Mike & Maureen Love
87.	5018837726,29	March 17, 2014 Letter from Eric Zeanah to Vickie Harden
88.	5019018696-708	April 4, 2014 Consumer Complaint with Attachments
89.	5019126145-147	April 4, 2014 Email from Diane Pinkney
90.	5018837751	April 5, 2014 Email from Eric Zeanah
91.	AAI00049383-388	April 7, 2014 Email from Maria Rovito with Attachment
92.	5068543848-849	April 8, 2014 Email from Eric Rubel
93.	5018842268-269	April 09, 2014 Email from Eric Zeanah with Attachment
94.	5039155764-766	April 10, 2014 Email from Eric Zeanah
95.	AAI00047038	April 10, 2014 Email from Eric Rubel
96.	AAI00047010-018	April 16, 2014 Email from Eric Rubel
97.	5113551297	April 17, 2014 Email from Scott Edson
98.	AAI00046813-814	April 22, 2014 Email from Scott Edson
99.	AAI00046308-307	April 23, 2014 Email from Eric Rubel
100.	AAI00046317-326	April 25, 2014 Email from Eric Rubel
101.	5113550926	April 30, 2014 Email from Eric Rubel
102.	5019120602-603	May 2014 AGDC Monthly Progress Report
103.	5151430898-903	May 5, 2014 Letter from Bradley Richardson
104.	5019142087	June 2014 AGDC Monthly Progress Report
105.	9527368780	July 2014 AGDC Monthly Progress Report
106.	9528174028	July 2014 Stericycle Invoice
107.	9527322837	August 2014 AGDC Monthly Progress Report
108.	9528174032	August 2014 Stericycle Invoice
109.	9527458620	September 2014 AGDC Monthly Progress Report
110.	9528173850	September 2014 Stericycle Invoice
111.	9516506280	October 2014 AGDC Monthly Progress Report
112.	9528174034	October 2014 Stericycle Invoice
113.	5019160059	November 2014 AGDC Monthly Progress Report
114.	9528173852	November 2014 Stericycle Invoice
115.	5019285487	December 2014 AGDC Monthly Progress Report

116.	9528173853	December 2014 Stericycle Invoice
117.	9516506276	January 2015 AGDC Monthly Progress Report
118.	9528173854	January 2015 Stericycle Invoice
119.	9516505630	February 2015 AGDC Monthly Progress Report
120.	9528173855	February 2015 Stericycle Invoice
121.	9516506395	March 2015 AGDC Monthly Progress Report
122.	9528173843	March 2015 Stericycle Invoice
123.	9516505600	April 2015 AGDC Monthly Progress Report
124.	9528173737	April 2015 Stericycle Invoice
125.	9516505610	May 2015 AGDC Monthly Progress Report
126.	9516506093	June 2015 AGDC Monthly Progress Report
127.	5113556620-650	July 25, 2014 Email from M. Eisenstein with Attachments
128.	9516506357	July 2015 AGDC Monthly Progress Report
129.	9516506313	September 2015 AGDC Monthly Progress Report
130.	9516505705	October 2015 AGDC Monthly Progress Report
131.	9516506699	November 2015 AGDC Monthly Progress Report
132.	9516506705	December 2015 AGDC Monthly Progress Report
133.	9516506701	January 2016 AGDC Monthly Progress Report
134.	9516506703	February 2016 AGDC Monthly Progress Report
135.	To be produced	Stericycle invoices post-dating April 2015
136.	To be produced	Documentation reflecting number of replacement items shipped consumers
137.	To be produced	Documentation reflecting fees paid to PFSWeb for shipping replacement items to consumers
138.	To be produced	Documentation reflecting fees paid to Sitel for processing orders
139.	To be produced	Documentation reflecting fees paid to Alorica for call center
140.	To be produced	Documentation reflecting fees paid to Leo Burnett for sorry marketing mailing and buck slip production
141.	To be produced	Stericycle fee proposal

PM USA reserves the right to rely upon and use any exhibit identified by Defendant that is properly before the Court.

Pursuant to Paragraph 13 of this Court's Initial Pretrial Order, PM USA certifies that it is delivering pre-marked copies of the above-referenced exhibits to counsel for Defendant.

Dated: June 8, 2016

Respectfully submitted,

PLAINTIFF PHILIP MORRIS USA INC.

By: _____/s/
Turner Broughton (VSB # 42627)
tbringoton@williamsmullen.com
Williams Mullen
A Professional Corporation
200 South 10th Street
Richmond, VA 23219
Phone: (804) 420-6000
Fax: (804) 420-6507

Anand Agneshwar (*pro hac vice*)
anand.agneshwar@aporter.com
Arnold & Porter LLP
399 Park Avenue
New York, NY 10022
Phone: (804) 420-6000
Fax: (804) 420-6507

Paige Sharpe (VSB # 88883)
paige.sharpe@aporter.com
Jocelyn Wiesner (*pro hac vice*)
jocelyn.wiesner@aporter.com
Emily May (*pro hac vice*)
emily.may@aporter.com
Arnold & Porter LLP
601 Massachusetts Avenue NW
Washington, DC 20001
Phone: (202) 942-5000
Fax: (202) 942-5999

CERTIFICATE OF SERVICE

I certify that on the 8th day of June 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following, as well as a copy via email to:

F. Douglas Ross
Douglas.Ross@ofplaw.com
Bruce M. Blanchard
Bruce.Blanchard@ofplaw.com
Luke J. Archer
Luke.Archer@ofplaw.com
ODIN, FELDMAN & PITTELMAN, P.C.
1775 Wiehle Avenue, Suite 400
Reston, Virginia 20190

R. Bradford Brittan
bbrittan@merchantgould.com
John T. Winemiller
jwinemiller@merchantgould.com
MERCHANT & GOULD P.C.
9717 Cogdill Road, Suite 101
Knoxville, TN 37932

*Counsel for Defendant
American Accessories International, L.L.C.*

I further certify that on the 8th day of June 2016, I served a copy via email to:

Richmond Turner Moore (*pro hac vice* pending)
rtmoore@wc.com
Shauna Meryl Kramer (*pro hac vice* pending)
skramer@wc.com
WILLIAMS & CONNOLLY LLP
725 Twelfth Street NW
Washington, DC 20005

*Counsel for Defendant
American Accessories International, L.L.C.*

/s/
Paige Sharpe
Counsel for Plaintiff Philip Morris USA Inc.